

09:32:36 1 evaluate the financial aspects of the transaction, you said "the  
32:40 2 client" meant Sports Shinko in general; is that correct?

09:32:45 3 A. Correct. I think that, you know, if you go back to  
09:32:53 4 the question and the answer, I think the response basically is  
09:33:04 5 saying that with respect to the financial aspects deal, that we  
09:33:10 6 did not participate and we weren't asked, whether it was as a  
09:33:16 7 director or as attorneys or anything else -- although the  
09:33:21 8 response probably should have been with respect to as a  
09:33:23 9 director.

09:33:24 10 But from that standpoint, there was no request made to  
09:33:31 11 evaluate the terms, the financial terms of the deal. Am I  
09:33:36 12 clear?

09:33:36 13 Q. I think some of it is clear. Let me see if I can  
09:33:42 14 clarify it a bit. So when you say that you were not requested  
09:33:46 15 by the client to evaluate the financial aspects of the  
09:33:48 16 transaction, you're referring to yourself and your firm in your  
09:33:57 17 capacity as an attorney?

09:33:57 18 A. As an attorney, as a director. Your question was as a  
09:34:00 19 director, yeah?

09:34:02 20 Q. Right.

09:34:03 21 A. Taken to investigate. The response was we weren't  
09:34:10 22 asked to do it and we didn't do it.

09:34:10 23 Q. But when you say "we," are you referring to your law  
09:34:13 24 firm or are you referring to some other group?

09:34:16 25 A. Myself and as a law firm.

09:36:18 1 respect to that transaction, I was no longer a director of the  
36:23 2 company. So there was really no reason for me to evaluate the  
09:36:27 3 transaction itself. And the transaction itself was not --.

09:36:39 4 We were advised to move forward with respect to  
09:36:44 5 that -- and I'm now talking as a law firm -- in January. And  
09:36:49 6 that was a time where we were told that there was an interest in  
09:36:53 7 doing the transaction. So by that time, I was no longer a  
09:36:58 8 director. So there's no reason, you know -- and that's the  
09:37:02 9 difficulty in answering, I guess, the interrogatory response --  
09:37:06 10 because there is no reason for as a director to evaluate  
09:37:10 11 anything at that point in time.

09:37:13 12 And secondly, with respect to the attorneys, we  
09:37:17 13 weren't asked to evaluate the transaction from a financial  
37:22 14 standpoint. I hope that clears up in your mind, you know, from  
09:37:29 15 a functional standpoint as a director, there was no reason to go  
09:37:33 16 ahead and look at the transaction.

09:37:37 17 Q. Let's take the period December 2001 until January 2,  
09:37:45 18 2002 when you resigned. In that time period, KG had made an  
09:37:57 19 offer of a certain dollar amount for the properties, correct?

09:38:00 20 A. Well, we didn't know that.

09:38:05 21 Q. "We" meaning?

09:38:06 22 A. The people who -- well, no one told me that there was  
09:38:10 23 a dollar amount.

09:38:17 24 Q. When did you first learn that KG made a proposal with  
09:38:24 25 a dollar amount to purchase the Sports Shinko Hawai`i

09:38:28 1 properties?

38:29 2 A. My recollection is that sometime in January, I think.

09:38:38 3 And actually, we didn't know what the terms were. We were

09:38:42 4 told -- we were asked to start working with the attorneys for KG

09:38:49 5 on doing the transaction.

09:38:52 6 At that time, at that time my recollection is that we

09:38:57 7 sent documents to KG's attorney with blank documents and said

09:39:05 8 fill in the terms, we don't know what the deal is, something to

09:39:09 9 that effect. I may not be correct in the exact analysis, but

09:39:15 10 the time sequence is, I think, is probably correct. Sometime

09:39:21 11 early January.

09:39:23 12 And that started the discussions, I guess, if you

09:39:27 13 will, with respect to the transaction. And then when the

:39:31 14 documents came back, we found out what the economic terms.

09:39:39 15 Q. Just so I'm clear then. The first time that you were

09:39:40 16 aware that KG made a specific dollar amount offer to purchase

09:39:47 17 the Sports Shinko Hawai'i properties was after you resigned as

09:39:53 18 director on January 2, 2002?

09:39:55 19 A. I believe that's correct.

09:39:58 20 Q. Prior to that time, were you aware that KG made a

09:40:03 21 proposal, in general, without knowing the dollar amount?

09:40:09 22 A. Not at that time. Subsequent to that time, in paper

09:40:22 23 documents, I think that I found out that there was something

09:40:26 24 that occurred during that period of time. But during that

09:40:30 25 period of time, I didn't see any proposals.

09:40:34 1 Q. Just so we're clear. Before you resigned as a  
40:39 2 director on January 2, 2002, were you aware at any time that KG  
09:40:45 3 made a proposal to purchase the Sports Shinko Hawai'i  
09:40:49 4 properties, even though you may not have known the specific  
09:40:53 5 price?

09:40:53 6 A. I can't recall. I can't recall because it's clouded  
09:41:05 7 by after-the-fact, reading the paper. And I'm almost sure that  
09:41:15 8 I know that there were discussions, but actual offers --.

09:41:22 9 Q. But actual offers?

09:41:24 10 A. Actual offers, I don't recall knowing about actual  
09:41:30 11 offers with prices -- with prices being discussed.

09:41:42 12 Q. Prior to January 2, 2002, you were aware of  
09:41:52 13 discussions between Sports Shinko and KG concerning the  
41:55 14 potential purchase of the Hawai'i properties; is that correct?

09:42:00 15 A. Yes.

09:42:00 16 Q. Tell me, to the best of your knowledge, what  
09:42:06 17 discussions you were aware of.

09:42:12 18 A. Well, I'm going to have to clarify myself here  
09:42:20 19 because, you know, as I said, subsequent to that time I have  
09:42:25 20 looked at other items which may have indicated what might have  
09:42:31 21 occurred during that period of time.

09:42:35 22 But sometime in early December, someone from KG -- and  
09:42:43 23 I believe Mr. Tanigawa -- asked for the representative in Sports  
09:42:55 24 Shinko that he might direct an inquiry. So I think I gave him  
~9:43:00 25 the address, where to be addressed. And I can't recall if I

09:43:07 1 probably gave him the name.  
43:14 2 And so I was aware that he had made an inquiry to  
09:43:19 3 Sports Shinko. And I was aware that there were discussions,  
09:43:27 4 probably ongoing discussions. But as to what those discussions  
09:43:35 5 were, I couldn't tell you.

09:43:41 6 Q. When you say that it was probably Mr. Tanigawa who  
09:43:46 7 asked for a Sports Shinko rep to whom he might direct an  
09:43:53 8 inquiry, the inquiry was about the potential purchase of the  
09:43:56 9 Hawai`i properties; is that correct?  
09:43:57 10 A. That's correct. An interest in the property is I  
09:44:07 11 speculate and say that interest means that they were interested  
09:44:10 12 in buying the properties. So to answer your question, I don't  
09:44:16 13 know if he said particularly that I wanted to buy the properties  
09:44:21 14 or KG wanted to buy the properties, but there was some interest  
09:44:26 15 in the properties. So I can't tell you exactly what the words

09:44:31 16 he used.  
09:44:31 17 Q. Those properties, though, are referring to Sports  
09:44:34 18 Shinko Hawai`i properties?  
09:44:37 19 A. I'm guessing. And I would assume that that's what he  
09:44:44 20 was referring to. But he's the best person to ask.  
09:44:46 21 Q. When he called you and he said that he wanted a Sports  
09:44:51 22 Shinko representative to whom he might direct an inquiry, what  
09:44:57 23 did you understand him to be asking?  
09:44:59 24 A. What did I understand him to --? I understood him to  
09:45:04 25 have an interest -- and this occurs all the time -- interest in

09:45:08 1 the properties that Sports Shinko may have, so.

45:11 2 Q. "The properties that Sports Shinko may have"; that  
09:45:13 3 included the Hawai'i properties?

09:45:15 4 A. Yes, correct. Hawai'i properties. When I said the  
09:45:20 5 Sports Shinko properties, I'm referring to Hawai'i properties  
09:45:23 6 now.

09:45:24 7 Q. Can you recall anything else that either you or  
09:45:31 8 Mr. Tanigawa said in that initial inquiry discussion?

09:45:36 9 A. That's a very short discussion.

09:45:39 10 Q. Was it by phone?

09:45:43 11 A. I believe so.

09:45:43 12 Q. Did he initiate the call?

09:45:47 13 A. Yes. Well, my recollection is yes.

:45:52 14 Q. Did he explain how he knew to contact you?

09:45:56 15 A. With respect to why he's contacting me, well, I know  
09:46:06 16 Mr. Tanigawa. And I'm guessing that he knew that I represented  
09:46:15 17 Sports Shinko as an attorney.

09:46:19 18 Q. Did he say why he was contacting you about the inquiry  
09:46:26 19 on behalf of KG?

09:46:30 20 A. Why me, as opposed to anybody else?

09:46:31 21 Q. Yes.

09:46:33 22 A. I don't think he meant -- well, I can't recall.

09:46:38 23 Q. Why do you think the basis for his calling you was  
09:46:43 24 that he knew you were the attorney for Sports Shinko?

~9:46:47 25 A. One more time.

09:48:55 1 any Mainland-based Sports Shinko companies. The only company  
48:59 2 that I represented was the Sports Shinko Hawai'i entities.

09:49:03 3 Q. Did you represent any Sports Shinko entity in Japan?

09:49:07 4 A. No.

09:49:08 5 Q. And by "you," I mean you and/or your firm.

09:49:15 6 A. Well, we're not, we wouldn't be authorized to  
09:49:22 7 practice. I mean, we would never give advice with respect to  
09:49:25 8 Japanese law.

09:49:30 9 Q. Did you or your firm ever do legal work for the Sports  
09:49:34 10 Shinko company in Japan?

09:49:34 11 A. Not to my knowledge.

09:49:38 12 Q. Prior to January 2, 2002, did you do any analysis of  
09:50:03 13 offers that came in for the Sports Shinko Hawai'i properties as  
:50:09 14 a director of the Hawai'i entities?

09:50:15 15 A. As a director, no.

09:50:16 16 Q. Did you ever review any offers that came in for the  
09:50:27 17 Sports Shinko Hawai'i properties as a director prior to  
09:50:33 18 January 2, 2002?

09:50:37 19 A. Could you repeat that question?

09:50:54 20 (Record read by the reporter.)

09:50:54 21 A. And you're separating myself out from the attorney as  
09:51:04 22 opposed to director?

09:51:07 23 Q. (Nods.)

09:51:07 24 A. No. I looked at it from a capacity. You know, I  
09:51:10 25 didn't distinguish either one. But we reviewed offers that came

09:51:19 1 in at the request, solicitation of Sports Shinko saying look at  
51:25 2 it.

09:51:25 3 And maybe I should explain that. You know, I was an  
09:51:35 4 accommodation, what I consider accommodation director. And as  
09:51:40 5 you probably know, there was a law that required resident  
09:51:44 6 directors. And once that law was changed, there is no need for  
09:51:59 7 me. And that's the reason why I resigned.

09:52:00 8 But during the period of time that I was director,  
09:52:06 9 there were no meetings called for directors. And Mr. Kinoshita,  
09:52:14 10 Toshio Kinoshita, had absolute control of all the Hawai'i  
09:52:20 11 companies. And to the extent that he wanted to remove a  
09:52:30 12 director, he would remove a director in 5 seconds, the time it  
09:52:34 13 takes for writing a resolution saying he's removed.

09:52:39 14 So there were no meetings. There were no budget  
09:52:45 15 discussions. And so it wasn't a, what you would normally  
09:52:54 16 consider a board functioning.

09:52:59 17 Q. I'll go back and clarify this. And I don't know if  
09:53:05 18 you'll remember this from what you've said because you said a  
09:53:10 19 few things here. But initially, you said that you did not  
09:53:14 20 distinguish any one. Do you recall saying that?

09:53:19 21 A. Distinguish any one?

09:53:20 22 Q. That was going to be my question. What were you  
09:53:23 23 talking about. Why don't we do this? I'm going to have the  
09:53:26 24 court reporter read back.

09:53:29 25 MR. WAKUZAWA: Let's go off the record for a minute.

09:57:37 1 A. Oh, yeah. No question from a standpoint of the law  
57:40 2 firm.

09:57:43 3 Q. Hold on. I don't mean to cut you off. But I'm just  
09:57:45 4 trying to get clarification of your terminology.

09:57:48 5 A. We.

09:57:48 6 Q. We. By "we," you meant yourself and your law firm?

09:57:52 7 A. Well, in the context that I was trying to say was that  
09:57:56 8 insofar as any valuation issues, and when you said -- that's why  
09:58:02 9 I went back and you said review offers. The context of review  
09:58:07 10 offers is a concept where if you're saying whether you're  
09:58:14 11 reviewing the offer as to the value, or you're reviewing the  
09:58:17 12 offer as to the legal implications of the offer, I'm basically  
09:58:20 13 saying we weren't looking at it from a value standpoint.

:58:24 14 Q. Again, "we," means yourself and your law firm?

09:58:27 15 A. Myself and law firm; and in that context, at that  
09:58:34 16 point in time, as a director. We relied on experts. As a  
09:58:38 17 director, we relied on experts to provide us what might be  
09:58:46 18 appropriate values with respect to the properties.

09:58:51 19 Q. Let me go back and try to clarify this whole thing.  
09:59:06 20 Prior to January 2, 2002, did you, in your capacity as  
09:59:15 21 a director -- not an attorney -- on behalf of any Sports Shinko  
09:59:22 22 Hawai'i entity, review any offers to purchase the property from  
09:59:30 23 any perspective, be it legal or financial?

09:59:38 24 A. As a director?

09:59:41 25 Q. Yes.

09:59:41 1 A. I don't believe so. Let me clarify that. I don't  
00:01 2 believe so. And I guess in that sense, it's a little hard to  
10:00:07 3 separate because what we had as attorneys was information from  
10:00:10 4 the brokers and as to what they thought might be the value.  
10:00:22 5 So evaluating, when you try to distinguish the two,  
10:00:27 6 it's, you know, I'm saying basically that as a director and an  
10:00:33 7 attorney, we weren't looking at expressing the views that the  
10:00:41 8 experts were espousing at that time. And what I'm saying is,  
10:00:48 9 you know, they had independent brokers saying this is a good  
10:00:52 10 value, this is a good value and so forth.  
10:00:55 11 When you say review offers, from that standpoint,  
10:01:03 12 there wasn't an independent broker for me to go out and find an  
10:01:05 13 appraiser to say, okay, that offer makes sense by economic  
10:01:09 14 standpoint. I didn't do that as director. So I didn't do any  
10:01:14 15 independent investigations, if that's the question you're asking  
10:01:18 16 me.  
10:01:19 17 Q. You didn't do any independent investigations as to the  
10:01:26 18 value --  
10:01:26 19 A. Yeah, I didn't.  
10:01:27 20 Q. -- of any offers on any Sports Shinko Hawai'i  
10:01:35 21 properties as a director; is that correct?  
10:01:35 22 A. Repeat the question.  
10:01:59 23 (Question read by the reporter.)  
10:01:59 24 A. Yes. I didn't find, I didn't ask anybody for any  
10:02:08 25 appraisals or any expert's value in the properties.

10:06:44 1 person in a way.

06:48 2 Q. Again, I just don't understand your terminology. You  
10:06:52 3 said "they" would say?

10:06:53 4 A. Well, when I'm saying "they," I'm using it  
10:06:57 5 collectively. Usually basically communication would come from  
10:07:00 6 Satoshi and say okay, we can go and do this.

10:07:06 7 Q. So by the term "they," you're referring to Toshio and  
10:07:06 8 Satoshi?

10:07:12 9 A. Maybe the more appropriate thing to say is on a  
10:07:19 10 case-to-case basis, it was Satoshi. And I shouldn't say Toshio  
10:07:27 11 because I'm not sure whether there was any communications from  
10:07:31 12 Toshio.

10:07:34 13 Q. I'm just going follow up a little bit, and then we'll  
10:07:35 14 take a break.

10:07:38 15 A. Sure.

10:07:38 16 Q. Is there anything that you did on behalf of the Sports  
10:07:46 17 Shinko Hawai'i entities at any time that you served as a  
10:07:51 18 director, in your capacity as a director, not an attorney, that  
10:07:58 19 you can recall?

10:08:02 20 A. I'm sorry, repeat that question again.

10:08:07 21 Q. Well, let me ask it again. Can you recall anything  
10:08:10 22 that you did as a director on behalf of the Sports Shinko  
10:08:14 23 Hawai'i entities, and not as an attorney, at any time that you  
10:08:21 24 served as a director?

10:08:22 25 A. I signed written consents. As a director, if there

10:08:29 1 was an approval of, say, a required director action, I may have  
08:41 2 signed the approval. And at that time, I was acting as a  
10:08:46 3 director.

10:08:50 4 Q. Anything else other than what you've said?

10:08:53 5 A. Not that I can recall.

10:08:55 6 MR. WAKUZAWA: Why don't we take a short break.

10:09:02 7 (Recess, 10:09 a.m. to 10:21 a.m.)

10:21:38 8 Q. Mr. Mukai, you talked about the initial contact from  
10:21:52 9 KG when Mr. Tanigawa called you and asked to be referred to a  
10:21:58 10 representative of Sports Shinkō to direct his inquiry, correct?

10:22:02 11 A. Correct.

10:22:02 12 Q. Did Mr. Tanigawa specifically say that he was making  
10:22:06 13 the inquiry on behalf of KG, Kobayashi Group?

10:22:11 14 A. I don't recall.

10:22:17 15 Q. Do you recall if he identified on whose behalf he was  
10:22:18 16 calling?

10:22:20 17 A. No.

10:22:21 18 Q. At any time prior to January 2, 2002, did you learn  
10:22:31 19 that the Kobayashi Group or a company affiliated with Bert  
10:22:37 20 Kobayashi made an offer for the Sports Shinko properties?

10:22:56 21 MR. BORDNER: I'm sorry, could you read it back.

10:23:02 22 (Question read by the reporter.)

10:23:02 23 A. I can't -- I don't recall knowing whether an offer was  
10:23:17 24 made. I know that probably there were discussions.

10:23:20 25 Q. How were you aware that discussions were going on

10:27:57 1 Q. I want to go back to something else that you said.  
28:03 2 You said that you considered yourself an accommodation director,  
10:28:09 3 correct?  
10:28:09 4 A. Correct.

10:28:09 5 Q. What does that mean?  
10:28:09 6 A. Accommodation director. From my perspective, they  
10:28:19 7 needed someone to fulfill the statutory requirements of Hawaii.  
10:28:29 8 They didn't, at least from my perspective, they didn't look upon  
10:28:37 9 me as one who would participate, was expected to participate on  
10:28:45 10 the processes that they normally used at, Sports Shinko entities  
10:28:54 11 used in their operations.  
10:28:57 12 Q. By "they," are you referring to Satoshi and Toshio  
10:29:01 13 Kinoshita?  
10:29:01 14 A. I guess Toshio Kinoshita's standpoint.  
10:29:11 15 Q. Did Toshio Kinoshita ever tell you that he did not  
10:29:16 16 look to you to participate in all of the processes for the  
10:29:22 17 Sports Shinko Hawaii entities?  
10:29:28 18 MR. BORDNER: You mean as a director?  
10:29:28 19 MR. WAKUZAWA: Yes.  
10:29:29 20 A. No, he didn't directly say that. But I wasn't invited  
10:29:40 21 to any meetings where other Sports Shinko people were involved  
10:29:59 22 in discussions about operations or otherwise.  
10:30:04 23 Q. Did you ever ask to attend such meetings?  
10:30:11 24 A. Frankly, I didn't know whether there were any  
10:30:14 25 meetings.

10:35:00 1 Q. That would be Toshio Kinoshita?

35:01 2 A. That's correct.

10:35:02 3 Q. Did Toshio Kinoshita ask you to resign as a director?

10:35:09 4 A. Resign as director? No.

10:35:12 5 Q. You decided to resign on your own?

10:35:14 6 A. That's correct.

10:35:17 7 Q. I believe you said that the reason you resigned is you

10:35:20 8 said that the law changed, and there was no reason for you to

10:35:28 9 serve as a director after that; is that fair?

10:35:30 10 A. That's correct.

10:35:30 11 Q. Any other reason you chose to resign?

10:35:33 12 A. Well, you know, I guess when you suggest there's a

10:35:38 13 difference between accommodation, there's really nothing

:35:42 14 functional that I was serving as a director. And although they

10:35:48 15 didn't come into play, there was a thought that I wasn't doing

10:35:52 16 anything as a director, necessarily doing anything that required

10:35:59 17 me to be a director.

10:36:03 18 Q. Any other --

10:36:03 19 A. But it was an act of, purely on my part.

10:36:09 20 Q. Any other reason for your resigning as a director

10:36:12 21 other than what you've said?

10:36:15 22 A. I can't think of it now.

10:36:19 23 Q. When did the law change that you're talking about?

10:36:22 24 A. Sometime in 2001.

:36:31 25 Q. What specific law are you referring to?

11:19:20 1 (Recess, 11:19 a.m. to 11:25 a.m.)

11:26:04 2 Q. Mr. Mukai, do you remember that you and your law firm

11:26:09 3 prepared some management agreements for the Sports Shinko

11:26:16 4 entities?

11:26:16 5 A. I believe so.

11:26:16 6 Q. What do you recall about the purpose for those

11:26:22 7 management -- strike that. What was the purpose for those

11:26:23 8 management agreements?

11:26:24 9 A. I believe that they wanted to separate the ownership

11:26:40 10 and the management and provide for employees. Something to that

11:26:44 11 effect.

11:26:48 12 Q. "They" referring to?

11:26:51 13 A. Sports Shinko.

11:26:55 14 Q. Which Sports Shinko entities are you talking --

11:26:59 15 A. Sports Shinko Hawaii entities.

11:27:03 16 Q. Did someone tell you this purpose?

11:27:07 17 A. I believe Satoshi mentioned it.

11:27:11 18 Q. Did he tell you any other purpose for the management

11:27:14 19 agreements?

11:27:15 20 A. I don't recall.

11:27:16 21 Q. Did he tell you why all of a sudden they wanted to

11:27:22 22 have those management agreements drafted?

11:27:26 23 A. I don't recall.

11:27:26 24 Q. Were you the primary contact with Satoshi Kinoshita in

11:27:34 25 your law firm?

11:38:44 1 A. I think the Hawaii properties was a different company.

:38:50 2 Q. Do you have any understanding as to what Management

11:38:56 3 Services of the Pacific and Far East Management Services were

11:38:59 4 supposed to manage?

11:39:02 5 A. Not sure. But my recollection, I guess, is that these

11:39:08 6 companies were dissolved shortly.

11:39:15 7 Q. Yeah, they may have been dissolved afterwards. But

11:39:20 8 I'm talking about when you formed them, were they designed to

11:39:24 9 manage some properties belonging to Sports Shinko, whether in

11:39:28 10 Hawai'i or somewhere else?

11:39:32 11 A. That could be.

11:39:37 12 Q. Do you have any reason to believe that they were

11:39:41 13 formed to manage properties other than properties owned by

:39:48 14 Sports Shinko?

11:39:53 15 A. Not sure.

11:39:55 16 Q. Then it mentions a resignation letter of Geraldine

11:40:03 17 Calaycay?

11:40:04 18 A. Yeah.

11:40:06 19 Q. Do you know who Geraldine Calaycay is?

11:40:07 20 A. She's a secretary.

11:40:09 21 Q. Secretary of what?

11:40:11 22 A. At my law firm.

11:40:14 23 Q. Do you know how it is that she became an officer and

11:40:18 24 director of the companies?

11:40:19 25 A. Well, in the incorporation process, it's not an

13:37:07 1 the option, Stock Option Agreement; you remember that?

:37:11 2 A. Yes.

13:37:13 3 Q. Did you ever have discussions with Satoshi Kinoshita

13:37:20 4 about wanting an option because of concerns that Toshio

13:37:27 5 Kinoshita had loans from a bank in Japan or the United States,

13:37:34 6 and that if he were the shareholder of the management companies

13:37:39 7 directly, it would come to the attention of the RCC?

13:37:44 8 A. I don't know, Counsel.

13:37:47 9 Q. Do you remember having any conversation with Satoshi

13:37:52 10 Kinoshita about a concern that if Mr. Toshio Kinoshita held

13:38:00 11 shares to a company in Hawai'i, it would come to the attention

13:38:03 12 of the RCC in Japan?

13:38:06 13 A. Read that one more time, the question.

:38:29 14 (Record read by the reporter.)

13:38:29 15 A. I have no recollection.

13:38:31 16 Q. Do you recall having discussions on that subject with

13:38:37 17 anybody?

13:38:37 18 A. On the subject, the last question that you --?

13:38:43 19 Q. (Nods.)

13:38:43 20 A. I don't have a recollection.

13:38:45 21 Q. Did Mr. Satoshi Kinoshita ever tell you that he was

13:38:56 22 served with a document issued by the Osaka District Court

13:39:05 23 related to the RCC?

13:39:06 24 A. I don't have a recollection at this time.

13:39:14 25 Q. Do you remember having any discussions with him about